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**From:** Dunn, Alexandra [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=426D0177EAAB4001A5C85F051565997E-DUNN, ALEXA]  
**Sent:** 6/27/2018 3:02:30 PM  
**To:** Gutro, Doug [Gutro.Doug@epa.gov]; Murphy, Jim [Murphy.Jim@epa.gov]  
**Subject:** Fwd: Your Turnout Gear and PFOA statement at New England EPA PFAS Community Engagement, Exeter NH 6.25.2018  
**Attachments:** Professor Peaslee's reply to question on PPE PFAS amounts.PNG; ATT00001.htm; DuPont\_Shareholders\_Know\_More.pdf; ATT00002.htm; sb 6413.pdf; ATT00003.htm; cdc\_19394\_DS1 (1) (1).pdf; ATT00004.htm; Professor Peaslee results.png; ATT00005.htm; initial turnout gear pfas test results August 2017.PNG; ATT00006.htm; PPE storage 1.PNG; ATT00007.htm; PPE storage 2.PNG; ATT00008.htm; ppe storage 3.PNG; ATT00009.htm; PPE storage 4.PNG; ATT00010.htm

*Sent from my iPhone*

Alexandra Dapolito Dunn, J.D.  
Regional Administrator  
Region 1 New England  
(617) 918-1012

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Begin forwarded message:

**From:** "d" <[REDACTED]> **Personal Email / Ex. 6**  
**To:** "Grevatt, Peter" <Grevatt.Peter@epa.gov>, "Dunn, Alexandra" <dunn.alexandra@epa.gov>, "geoffdaly@mkd-usa.com" <geoffdaly@mkd-usa.com>  
**Cc:** "gpeaslee@nd.edu" <gpeaslee@nd.edu>, "mindy@mindiforcongress.com" <mindy@mindiforcongress.com>  
**Subject:** Your Turnout Gear and PFOA statement at New England EPA PFAS Community Engagement, Exeter NH 6.25.2018

Good Morning all,

Dr Grevatt, Ms Dunn, thank you for hearing my statement Monday evening at the EPA PFAS Community Engagement.

Please understand we have been trying for well over one year to bring immediate attention to this issue for the fire service. I'm sure it may have been a shock to see how much PFAS was in our turnout gear.

I wanted to bring Professor Peaslee into the conversation please, as he first tested the gear last year for PFAS content, then he tested for PFOA content. He has the same concerns about the water as you folks do. (see Professor Peaslee's reply...attachment)

My grave concern is for what is degrading in the fire stations. But if we can address that while you folks look at the water issue then by all means. (See attachments PPE storage 1-4 for examples)

Geoff Daly, your input to Paul and I was invaluable and I'd like you to meet Professor Graham Peaslee.

Mindi has been working since last August to shed light on this issue, speaking at fire stations and writing articles to bring insight to the issue that the turnout gear coatings need nation wide recognition.

But truly, we are desperate for CDC to get on board with this issue. The staggering amounts of PFOA/PFNA that collect over and over in the area where a FF hangs their gear is keeping me up at night.

Please see below for supporting links to statements I made Monday evening.

Thank you all.  
Diane Cotter

<https://www.facebook.com/1808869939437081/videos/2080367175620688/UzpfSTUwNzc0MDA5MToxMDE2MDU5MjUxNDcwMDA5Mg/>

**Transcript from the first in the nation New England EPA PFAS Summit in Exeter, NH. 6.25.18**

**Thank you Organizers and EPA Panel Members for allowing me this opportunity to speak.**

**My name is diane cotter, I am here with my husband, Lt Paul Cotter, retired, 28 year veteran, Worcester Fire Department . And cancer survivor.**

**My community is the 1.3 million firefighters in this nation who have been completely overlooked in this PFAS catastrophe.**

**America's firefighters have been on the front line of PFAS exposure since 1983 using it in AFFF, being sprayed in our faces, wading in it, having turnout gear soaked in it, and exposing our families to it after bringing gear home.**

**We were not aware how toxic this substance was. This turnout gear I have is from 2004, it is new and never worn or 'contaminated' as the fire service would say. Jan of 2018 our grassroots effort acquired Professor of Physics Graham Peaselee, of Notre Dame Univ to test it for PFAS content. Just the 'fraction of the potential' that is in this gear tested at 157 ppb PFOA and 257 PFNA.**

**THAT IS 14, 000 times the newly set recommended limit of PFOA.**

**Turnout gear has been impregnated with PFOA since 1999 (at least) to meet NFPA water repellent STANDARDS. We were never made aware. We do not know how much. Only our gear manufacturers have that information. We sweat in this gear, our body temperature rises and our skin absorbs these toxins. We start our careers in our child bearing years. PFOA and PFOS are designated by California Prop65 as causing 'reproductive cancers'.**

**In 2006 the European Chemical Agency (ECHA) notified gear manufacturesr they would be restricting PFOA in 'textiles'. One of those textiles is firefighter PPE. By 2012 PFOA was**

designated a Substance of Very High Concern there. Gear manufacturers were made aware of the decision to restrict the amount of PFOA in turnout gear to 25ppb and 'precursors' to 1ppm.

[http://www.hemmingfire.com/news/fullstory.php/aid/2601/Six-year\\_PFOA\\_reprieve\\_for\\_firefighters\\_protective\\_clothing.html](http://www.hemmingfire.com/news/fullstory.php/aid/2601/Six-year_PFOA_reprieve_for_firefighters_protective_clothing.html)

To date they have not advised the US of this issue. While the manufacturers are discussing and teaching about the issue in Europe, they have not mentioned it here. <https://www.firerescueforum.com/content>

They minimized the issue when it came up recently in a firefighting trade magazine published by 'Station Pride' titled 'The Real Cancer in Your Gear'. <https://station-pride.com/2017/03/28/the-real-cancer-in-your-gear/>

We are in a particularly high risk exposure setting as our gear has been degrading in our fire stations where we work, eat, sleep, since 1999.

The coating degrades in UV lighting, in many stations our gear is stored in open lighting next to apparatus in bays. Paul's station had 80 sets of gear rotating through his station in one week. The gear is designed to be used for 10 years. Over 20 years we have had thousands of sets releasing particles of PFOA into our stations.

The new short chain coatings are also a concern. NH State Rep and Enviro Scientist Mindi Messmer wrote an article on this issue titled Firefighter Cancer Quadfecta.

<https://www.firefighternation.com/articles/2018/06/firefighter-cancer-quadfecta.html> ;

From trade magazine FireFighter Nation:

The replacements, termed "short chain PFCs" were sported as better for the environment and public health. However, scientific studies conducted in laboratory animals indicate that the short chain replacements could be more toxic to humans since they accumulate longer in organs than the long chain legacy compounds. This may be the cause of cancer incidence in younger firefighters.

I have been advocating for a national health study specifically focused on firefighters to assess the health outcomes because they are highly exposed. It is often difficult to tie causation with cancer or other chronic diseases. Focusing on the highly exposed populations is more likely to carefully evaluate possible negative health outcomes for exposures to PFCs. This should include, at a minimum, thorough cancer screening and annual serum PFC monitoring of firefighters to provide longitudinal data to assess health outcomes (see Table 2). It is not enough to have a cancer registry, we have to prevent cancer by taking proactive steps to identify and prevent exposures in while firefighting, in fire stations, and in the turnout gear before they make firefighters sick.

To date there has not been a PFAS dust study done in our stations. Yet, biomonitoring has shown firefighters PFOA serum tested in ranges from 243 ng/mL to 423 ng/mL from a 'yet unknown source'. The 'DuPont Water Works' plant workers were considered high at 32 ng/mL.

Adding to this concern is the October 2, 2017 NH DES letter to every fire station in NH that of 6 of 7 New Hampshire fire stations water wells tested at 'elevated' levels of PFAS.

[https://www4.des.state.nh.us/nh-pfas-investigation/wp-content/uploads/2017/11/Fire\\_Department\\_H20Sample.pdf](https://www4.des.state.nh.us/nh-pfas-investigation/wp-content/uploads/2017/11/Fire_Department_H20Sample.pdf)

In 1992 DuPont's own scientist learned their PFOA caused testicular cancer. Testicular cancer is the number one cancer in the fire service. DuPont is a manufacturer of our gear. They have yet to tell us about this. They are immersed in every aspect of fire fighter cancer research, and teaching prevention methods. In 2006 they notified shareholders that 'any attempt to regulate PFOA would impact their bottom line'. They never shared that with us either. In 2005 the United Steelworkers Union advised Gore also a turnout gear manufacturer, and DuPont, to notify the end user of the harmful effects of PFOA. Neither did.

See attached (DuPont Shareholders.... page 29)

<https://www.cleanlink.com/news/article/Steelworkers-Union-Warn-of-Harm-from-Teflon-Related-Chemical-3717>

On September 5, 2017, Environmental Attorney Robert Bilott, C8 Science panel's Dr Paul A Brooks, and Fire Chief Jeff Hermes demanded testing and studies of the EPA, CDC/ATSDR, and US Attorney General on behalf of all first responders US due to their exposure from foam and gear.

<https://www.documentcloud.org/documents/3988104-Firefighter-Letter.html>

With NO regulations for these chemicals, manufacturers are under NO obligation to tell us what we are wearing, or spraying. They defiantly refuse to give us that information citing 'proprietary information'. They have even lobbied for and win the right to NOT put warning labels in our turnout gear. See here for the 'Liability Bill'; [https://www.femsa.org/whois\\_femsa/history/](https://www.femsa.org/whois_femsa/history/) ;

Our manufacturers sit on NFPA committees deciding safety standards of gear, from the balance of a helmet to the width of reflective tape. but are under no obligation to advise of the chemicals in our gear. They never did. Not once.

The newly released PFAS study mentions FF occupational and high risk of exposure numerous times.

Yet the fire service has been omitted from the multi million dollar PFAS Study award.

*We respectfully ask Senator Shaheen and Massachusetts Senator Elizabeth Warren to immediately add this nations fire fighters to the PFAS Registry along with the already chosen active military and veterans.*

The EPA and NIOSH have been kicking this issue of occupational exposure and setting limits down the road for over 40 years. Last week I shared a 1977 NIOSH report titled " Criteria for a recommended standard - occupational exposure to DECOMPOSITION PRODUCTS of FLUOROCARBON POLYMERS". Here in 2018 we are seeing the same thing.

(see attached cdc\_19394\_DS1)

Under both Democratic and Republican leadership the EPA and CDC have been a catastrophic failure to the fire service. Hasn't anyone wondered about the firefighter they see covered head to toe in A-tripleF?

After 40 yeras of undecisivness, the fire service took matters into its own hands. Washington State Council of Fire Fighters and Toxic Free Futur passed SB 6413 (attached) limiting the use

PFAS in AFFF and requiring labels be added advising the wearer of PFAS exposure in turnout gear.

The Professional Fire Fighters of Massachusetts and Toxics Action Center are both on board with this.

Last week the PFFM has voted unanimously to make PFAS legislation a priority.

The fire service can do this state to state to protect ourselves and fellow citizens.

And we WILL get it done.

But isn't that your job?

thank you.